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UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff.

V.

[REDACTED] and

TERRY WAYNE MOORE,

Defendants.

2:25-CR-57-MKD-2

INDICTMENT

Vio.: 21 U.S.C. §§ 841(a)(1),
(b)(1)(A)(viii), 846,
Conspiracy to Distribute 50
Grams or More of Actual
(Pure) Methamphetamine
(Count 1)

21 U.S.C. § 841(a)(1),
(b)(1)(B)(viii)
Distribution of 5 Grams or
More of Actual (Pure)
Methamphetamine
(Counts 2-4)

21 U.S.C. § 853
Forfeiture Allegations

The Grand Jury charges:

COUNT 1

Beginning on a date unknown, but by on or about November 2024, and

20 continuing to April 2025, in the Eastern District of Washington, the Defendants,

[REDACTED] and TERRY WAYNE MOORE, and other

1 individuals both known and unknown to the Grand Jury, did knowingly and
2 intentionally combine, conspire, confederate and agree together with each other to
3 commit the following offense: distribution of 50 grams or more of actual (pure)
4 methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. §§
5 841(a)(1), (b)(1)(A)(viii), all in violation of 21 U.S.C. § 846.

6 COUNT 2

7 On or about November 27, 2024, in the Eastern District of Washington, the
8 Defendant, [REDACTED], did knowingly distribute 5 grams or
9 more of actual (pure) methamphetamine, a Schedule II controlled substance, in
10 violation of 21 U.S.C. § 841(a)(1), (b)(1)(B)(viii).

11 COUNT 3

12 On or about December 10, 2024, in the Eastern District of Washington, the
13 Defendant, [REDACTED], did knowingly distribute 5 grams or
14 more of actual (pure) methamphetamine, a Schedule II controlled substance, in
15 violation of 21 U.S.C. § 841(a)(1), (b)(1)(B)(viii).

16 COUNT 4

17 On or about February 13, 2025, in the Eastern District of Washington, the
18 Defendants, [REDACTED] and TERRY WAYNE MOORE, did
19 knowingly distribute 5 grams or more of actual (pure) methamphetamine, a
20 Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1),
21 (b)(1)(B)(viii) and 18 U.S.C. § 2.

NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS

The allegations set forth in this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture.

Pursuant to 21 U.S.C. § 853, upon conviction of an offense(s) in violation of
21 U.S.C. § 841, as set forth in this Indictment, the Defendants, [REDACTED]

[REDACTED] and TERRY WAYNE MOORE, shall forfeit to the United States of America, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense(s) and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of the offense(s).

If any forfeitable property described above, as a result of any act or omission of the Defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

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1 the United States of America shall be entitled to forfeiture of substitute property
2 pursuant to 21 U.S.C. § 853(p).

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4 DATED this _____ day of April 2025.

5 A TRUE BILL

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7 Foreperson

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9 Richard R. Barker
Acting United States Attorney

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12 Rebecca R. Perez
Assistant United States Attorney

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INDICTMENT – 4